



The
SPACECONNECTION, Inc.

January 24, 2017

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service, RM-11778

Dear Ms. Dortch:

The SPACECONNECTION respectfully submits this reply in opposition to the Petition for Rulemaking ("Petition") filed by Fixed Wireless Communications Coalition, Inc. ("FWCC") in the above-captioned proceeding.¹ The SPACECONNECTION fully supports the satellite industry's opposition to the rule changes proposed by the FWCC.² In particular, The SPACECONNECTION agrees with Intelsat that adopting FWCC's radical proposal to eliminate the Commission's long-standing and highly successful full-band, full-arc earth station licensing policy would critically harm the Fixed-Satellite Service ("FSS") customers that this flexible policy was designed to protect. As explained below, The SPACECONNECTION is such a customer. Accordingly, The SPACECONNECTION respectfully requests that the Commission deny or dismiss FWCC's Petition.

The SPACECONNECTION provides satellite communication for multi-million dollar events and data transmission via C-band satellite spectrum. Using C-band spectrum we support energy companies in monitoring remote generation and distribution infrastructure nationwide. The SPACECONNECTION relies on C-band occasional use and full time satellite capacity to transmit data (Internet) as mission critical services to Alaska and internationally.

The Commission's existing full-band, full-arc earth station licensing policy is critically important for The SPACECONNECTION's occasional use, short-term satellite operations. The precise C-

¹ Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service, RM-11778 (filed Oct. 11, 2016).

² See, e.g., Opposition of Intelsat License LLC, RM-11778 (filed Jan. 9, 2017); Petition to Dismiss or Deny of the Satellite Industry Association, RM-11778 (filed Jan. 9, 2017); Petition to Dismiss or Deny of SES Americom, Inc. (filed Jan. 9, 2017); Opposition of EchoStar Satellite Operating Corporation and Hughes Network Systems, LLC, RM-11778 (filed Jan. 9, 2017).

band frequencies and satellites on which The SPACECONNECTION resells capacity for any given event depend on both the frequencies available at the particular location and the satellite capacity to which The SPACECONNECTION has access on an occasional use basis. FWCC's proposal would no longer allow for full-frequency, full-arc licenses and would, absent a waiver, require The SPACECONNECTION's customer to file a license modification application or request for special temporary prior to transmitting on any frequency or to a satellite in any orbital location not explicitly provided in the applicable license. Because the very nature of occasional use, short-term video operations requires that FSS customers have the flexibility to coordinate their operational parameters on extremely short notice, the rigid licensing regime proposed by FWCC in its Petition would render these services all but impossible. Accordingly, The SPACECONNECTION respectfully requests that the Commission deny or dismiss FWCC's Petition.

Sincerely,

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Robert Stevens
Director of Sales
The SPACECONNECTION

CERTIFICATE OF SERVICE

I, Derrick Johnson, hereby certify that on this 24th day of January, 2017, I caused a true and correct copy of the foregoing to be served by first-class mail, postage prepaid, on:

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